

REMARKS

Claims 19-22 have been examined and have been rejected under 35 U.S.C. § 103(a).

I. Objection to the title

The Examiner has objected to the title because it is allegedly not descriptive. Applicants submit that the amendments to the title overcome the objection.

II. Objection to the Abstract of the Disclosure

The Examiner has objected to the Abstract of the Disclosure because it is not drawn to a method. Applicants submit that the amendments to the title overcome the objection.

III. Rejection under 35 U.S.C. § 103(a) over U.S. Patent No. 5,537,133 to Marler et al. (“Marler”) and U.S. Patent No. 3,527,667 to Larsen et al. (“Larsen”)

Claims 19-22 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Marler and Larsen. Applicants submit that the claims are patentable over the cited references.

A. Claim 19

For example, claim 19 relates to a method that etches a rolled metal plate. On page 3 of the Office Action, the Examiner contends that the tape 104 disclosed in Marler corresponds to the claimed rolled metal plate, but Applicants respectfully disagree. For example, column 8, lines 50-56, state that the tape 104 is made of polymer. Therefore, Marler does not suggest etching a rolled metal plate.

Also, Larsen does not cure the deficient teachings of Marler. For example, although Fig. 3 of Larsen discloses forming a polymer layer 40 and 44 on a metal layer 14 (or 35), Larsen does not suggest etching the polymer layer 40 and 44 or the metal layer 14. Accordingly, if Larsen’s

combined layer 40, 44, and 14 (or 35) was somehow used in Marler's manufacturing method shown in Fig. 10, the manufacturing method would merely etch the polymer layer 40 and 44 of Larsen's combined layer 40, 44, and 14 (or 35). Therefore the combined teachings of the references do not suggest the features of claim 19.

Also, claim 19 states that the rolled metal plate is etched based on a rolling direction of the rolled metal plate. Since the references (alone or in combination) do not suggest etching a rolled metal plate, they cannot teach etching the plate based on a rolling direction.

In addition, claim 19 states that the rolling direction of the metal plate is perpendicular to a long side of an elastic plate. However, assuming *arguendo* that the tape 104 in Marler somehow corresponds to the metal plate and/or the elastic plate, Figs. 1, 3, and 10 clearly shows that the long side of the tape 104 is parallel to the rolling direction. Thus, to the extent that Marler is relevant to the subject matter of claim 19, it actually teaches away from the claimed invention.

For at least the above reasons, Applicants submit that claim 19 is patentable over Marler and Larsen.

B. Claims 20-22

Since claims 20-22 contain features that are analogous to one or more of the features discussed above in conjunction with claim 19, Applicants submit that such claims are patentable for similar reasons.

IV. Newly added claims

Applicants have added new claims 31-39 to provide more varied protection for the invention. Since claims 31 and 37 contain features that are analogous to at least some of the features discussed above in conjunction with claim 19, Applicants submit that such claims are patentable for similar reasons. Also, since claims 32-36, 38, and 39 depend upon claim 31 or 37, such claims are patentable at least by virtue of their dependency.

V. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


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